

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Andrew D. Breighner Gaylynn L. Breighner		CHAPTER 13
	<u>Debtors</u>	
MTGLQ Investors, LP	<u>Movant</u>	NO. 15-03172 MDF
vs.		
Andrew D. Breighner Gaylynn L. Breighner	<u>Debtors</u>	Nature of Proceeding: Motion for Relief
Charles J. DeHart, III Esq.		
	<u>Trustee</u>	

REQUEST TO CONTINUE HEARING WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance; both parties are attempting settlement.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: July 15, 2016

/s/ Joshua I. Goldman, Esquire

Joshua I. Goldman, Esquire
Attorney for Movant
BNY Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(215) 627-1322
Fax (215) 825-6406